

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Case No.: 2:24-CR-0008-TOR-1

Plaintiff,

v.

PROTECTIVE ORDER

KAYDEE JEAN BAKER,

Defendant.

The United States of America, having applied to this Court for a Protective Order regulating disclosure of the discovery materials and the sensitive information contained therein to defense counsel in connection with the Government's discovery obligations, and the Court finding good cause therefore, **IT IS HEREBY ORDERED:**

1. The United States' Unopposed Motion for Protective Order Regulating Disclosure of Discovery and Sensitive Information is **GRANTED**.

2. The United States is authorized to disclose the discovery including sensitive information and materials (hereinafter "Discovery") in its possession pursuant to the discovery obligations imposed by this Court.

3. Government personnel and counsel for Kaydee Jean Baker ("Defendant"), shall not provide, or make available, the sensitive information in the Discovery to any person except as specified in the Order or by approval from this Court. Counsel for Defendant and the Government shall restrict access to the Protective Order - 1

1 Discovery, and shall only disclose the sensitive information in the Discovery to their
2 client, office staff, investigators, independent paralegals, necessary third-party
3 vendors, consultants, and/or anticipated fact or expert witnesses to the extent that
4 defense counsel believes is necessary to assist in the defense of their client in this
5 matter or that the Government believes is necessary in the investigation and
6 prosecution of this matter.

7 4. Third parties contracted by the United States or counsel for Defendant
8 to provide expert analysis or testimony may possess and inspect the sensitive
9 information in the Discovery, but only as necessary to perform their case-related
10 duties or responsibilities in this matter. At all times, third parties shall be subject to
11 the terms of the Order.

12 5. Discovery in this matter will be available to defense counsel via access
13 to a case file on USA File Exchange. Counsel for Defense may download Discovery
14 from USA File Exchange and shall exercise reasonable care in ensuring the security
15 and confidentiality of the Discovery by electronically storing the Discovery on a
16 password-protected or encrypted storage medium, including a password-protected
17 computer, or device. If Discovery is printed, Counsel must also exercise reasonable
18 care in ensuring the security and confidentiality of the Discovery by storing copies
19 in a secure place, such as a locked office, or otherwise secure facility where visitors
20 are not left unescorted

21 6. All counsel of record in this matter, including counsel for the United
22 States, shall ensure that any party, including the Defendant, that obtains access to
23 the Discovery is advised of this Order and that all information must be held in strict
24 confidence and that the recipient may not further disclose or disseminate the
25 information. Any other party that obtains access to, or possession of, the Discovery
26 containing discovery information once the other party no longer requires access to
27 or possession of such Discovery shall promptly destroy or return the Discovery once
28 access to Discovery is no longer necessary. No other party that obtains access to or

1 possession of the Discovery containing sensitive information shall retain such access
2 to or possession of the Discovery containing sensitive information unless authorized
3 by this Order, nor further disseminate such Discovery except as authorized by this
4 Order or the further Order of this court. For purposes of this Order, “other party” is
5 any person other than appointed counsel for the United States or counsel for
6 Defendant.

7 7. All counsel of record, including counsel for the United States, shall
8 keep a list of the identity of each person to whom the Discovery containing sensitive
9 information is disclosed. Neither counsel for Defendant nor counsel for the United
10 States shall be required to disclose this list of persons unless ordered to do so by the
11 Court.

12 8. Upon entry of a final order of the Court in this matter and conclusion
13 of any direct appeals, government personnel and counsel for Defendant shall retrieve
14 and destroy all copies of the Discovery containing sensitive information, except that
15 counsel and government personnel may maintain copies in their closed files
16 following their customary procedures.

17 9. Government personnel and counsel for Defendant shall promptly report
18 to the Court any known violations of this Order.

19 **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter
20 this Order and provide copies to counsel.

21 **DATED** this 26th day of April 2024.




THOMAS O. RICE
United States District Judge